

July 16, 2010

Ms. Kathrina Donegan
Air Pollution Control Program
St. Louis County Health
74 Clarkson Wilson Ctr.
Chesterfield, Missouri 63017

**Re: Semi-Annual Startup, Shutdown and Malfunction (SSM) Report
2010 Semi-Annual Report
Bridgeton Landfill, LLC 189-0312
Air Operating Permit Number OP2010-063
Reporting Period: January 1, 2010 through June 30, 2010**

Dear Ms. Donegan:

The Bridgeton Landfill, LLC is subject to the National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, 40 CFR Part 63 Subparts A and AAAA (NESHAP). The NESHAP requires a facility to prepare and implement a start-up, shutdown and malfunction (SSM) Plan. The SSM Plan includes the procedures for operating and maintaining affected landfill gas (LFG) collection and control equipment as well as continuous control device monitoring equipment during start-up, shutdown and malfunction events. The Bridgeton Landfill, LLC is an existing source and implemented the SSM Plan on January 16, 2003.

In accordance with 40 CFR §63.10(d)(5), a semi-annual report must be submitted to the regulatory authority within 30 days of the completion of the calendar half. The report shall contain information pertaining to the facility's compliance with the procedures in their SSM Plan during SSM events. This letter serves as the Semi-Annual SSM Report for the reporting period January 1, 2010 through June 30, 2010.

During the period of January 1, 2010 through June 30, 2010 the Bridgeton Landfill documented sixty-two (62) SSM events in accordance with the Startup, Shutdown and Malfunction Plan developed for the facility and to comply with 40 CFR 63 Subpart AAAA. During this compliance period no deviations from the SSM Plan were recorded, therefore no revisions to the SSM Plan have been required.

For the reporting period, thirty-one (31) start-up and ten (10) shutdown events occurred. The actions taken at the facility for all SSM events during the reporting period January 1, 2010 through June 30, 2010 were consistent with the procedures listed in the SSM Plan at

Bridgeton Landfill, LLC
Semi-Annual Startup, Shutdown and Malfunction (SSM) Report
2010 Semi-Annual Report: January 1, 2010 through June 30, 2010
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the facility. Records of SSM events are maintained at the facility and available for review. During the reporting period, twenty-one (21) malfunction events occurred, of which none caused an applicable limitation to be exceeded. Table 1 contains the date, duration and description of all malfunction events for the reporting period.

Attached is certification by the Responsible Official. If you have any questions regarding this Semi-Annual SSM Report, please contact me at (573) 442-6391.

Sincerely,

Aquaterra Environmental Solutions, Inc.



Lina Klein, P.E.
Air Practice Lead



Michele A. Boussad
Associate Principal

Attachment: Table 1 - Description of Malfunction Events

c: Mike Tharpe, MDNR-APCP
Patricia Scott, EPA Region VII
David Vasbinder, Republic Services, Inc.
Niki Wuestenberg, Republic Services, Inc.
Bridgeton Landfill, LLC

Table 1: Malfunction Events
Bridgeton Landfill, LLC
Reporting Period January 1, 2010 through June 30, 2010

Date	Duration (hrs:min:sec)	Description of Malfunction (Include actions taken to correct a malfunction)	Equipment Affected	Were SSM Plan Procedures Followed?	Emission Limit Exceeded or Potentially Exceeded?*
1/4/10 22:19	0:36:00	Overvoltage	Control Device	Yes	No
1/5/2010 2:59	3:37:00	Low temperature alarm caused flare not to restart	Control Device	Yes	No
1/5/10 16:26	3:30:00	Variable frequency drive failed causing the flare not to restart	Control Device	Yes	No
1/6/2010 10:02	3:24:00	Variable frequency drive failed causing the flare not to restart	Control Device	Yes	No
1/6/2010 14:36	0:20:00	Variable frequency drive failed causing the flare not to restart	Control Device	Yes	No
1/6/2010 16:01	15:35:00	Variable frequency drive failed causing the flare not to restart	Control Device	Yes	No
1/7/2010 7:51	1:10:00	Variable frequency drive failed causing the flare not to restart	Control Device	Yes	No
1/7/10 9:51	0:05:00	Variable frequency drive failed causing the flare not to restart	Control Device	Yes	No
1/25/2010 3:44	6:30:00	Out of compressed nitrogen used to operate the flare's pneumatic auto valve.	Control Device	Yes	No
2/12/2010 13:52	1:36:00	Flare automatically shut down due to condensate collecting in the backup blower line.	Control Device	Yes	No
2/18/2010 12:57	1:01:00	Flare was shut down to drain condensate that had collected in the backup blower line.	Control Device	Yes	No
3/1/10 21:43	20:09:00	Flare automatically shut down due to an air line rupture	Control Device	Yes	No
3/12/10 22:40	3:16:00	Air leak at GEW82	Control Device	Yes	No
3/25/10 15:07	2:24:00	Power surge, automatic shutdown by unit's protective system	Control Device	Yes	No
04/02/10	4:22:00	Malfunction of the variable frequency drive	Control Device	Yes	No
04/26/10	2:29:00	Auto valve failure caused by the compressor	Control Device	Yes	No
05/07/10	0:50:00	Low temperature shutdown	Control Device	Yes	No
05/07/10	11:30:00	Low temperature shutdown	Control Device	Yes	No
05/08/10	9:00:00	Low temperature shutdown	Control Device	Yes	No

*If the malfunction event caused or may have caused an emission limit to be exceeded (i.e., raw LFG released to the air), enter YES

Table 1: Malfunction Events
Bridgeton Landfill, LLC
Reporting Period January 1, 2010 through June 30, 2010

Date	Duration (hrs:min:sec)	Description of Malfunction (include actions taken to correct a malfunction)	Equipment Affected	Were SSM Plan Procedures Followed?	Emission Limit Exceeded or Potentially Exceeded?*
05/26/10	9:00:00	Low temperature shutdown due to automatic louver motors malfunction	Control Device	Yes	No
05/27/10	139:06:00	Low temperature shutdown due to automatic louver motors malfunction	Control Device	Yes	No

*If the malfunction event caused or may have caused an emission limit to be exceeded (i.e., raw LFG released to the air), enter YES

Ms. Kathrina Donegan
Air Pollution Control Program
St. Louis County Health
74 Clarkson Wilson Ctr.
Chesterfield, Missouri 63017

July 16, 2010

Dear Ms. Donegan:

**Semi-Annual NSPS, NESHAP and Monitoring Reports
Bridgeton Landfill, LLC – Permit No. OP2010-063 (189-0312)**

On behalf of Bridgeton Landfill, LLC, enclosed are the Semi-Annual Monitoring Report for the Title V Operating Permit (OP2010-063), the Semi-Annual Report in accordance with New Source Performance Standards for Municipal Solid Waste Landfills 40 CFR 60 Subpart WWW (NSPS) and the Semi-Annual Startup, Shutdown and Malfunction (SSM) Plan Report per National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, 40 CFR Part 63 Subpart AAAA (NESHAP). The enclosed reports serve as the Title V Semi-Annual Monitoring Report, the Semi-Annual NSPS Report and the SSM Report for the period January 1, 2010 through June 30, 2010.

I certify based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

If you have any questions, please contact David Vasbinder at (314) 739-5099 or Lina Klein of Aquaterra Environmental Solutions at (573) 442-6391.

Sincerely,
REPUBLIC SERVICES, INC.

A handwritten signature in black ink, appearing to read 'Tim Trost', with a stylized flourish at the end.

Tim Trost
Area President

Cc: Mike Tharpe, MDNR-APCP
Patricia Scott, EPA Region VII
Niki Wuestenberg, Republic Services, Inc.
David Vasbinder, Republic Services, Inc.
Bridgeton Landfill, LLC



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 1 - INSTALLATION INFORMATION AND CERTIFICATION

FIPS NO.	189	PLANT NO.	0312
INSTALLATION NAME BRIDGETON LANDFILL, LLC			
INSTALLATION LOCATION (STREET ADDRESS AND CITY) 13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044			
OPERATING PERMIT NUMBER OP2010-063		DATE OPERATING PERMIT ISSUED 6/23/10	
TYPE OF REPORT <input type="checkbox"/> ANNUAL COMPLIANCE CERTIFICATION <input checked="" type="checkbox"/> SEMI-ANNUAL MONITORING REPORT EXCEED <input type="checkbox"/> CE REPORT			
IF ANNUAL COMPLIANCE CERTIFICATION, IS THE ANNUAL COMPLIANCE CERTIFICATION BEING SUBMITTED TO ALSO FULFILL THE REPORTING REQUIREMENTS FOR THE SEMI-ANNUAL MONITORING REPORT? <input type="checkbox"/> YES <input type="checkbox"/> NO			
REPORTING PERIOD START DATE 01/01/10		REPORTING PERIOD END DATE 6/30/10	
	RESPONSIBLE OFFICIAL	PERMIT CONTACT PERSON	
Name	TIM TROST	DAVID VASBINDER	
Title	AREA PRESIDENT	ENVIRONMENTAL MANAGER	
Mailing Address	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044	
Telephone Number	(314)739-5099	(314)739-5099	
HAS THE ABOVE INFORMATION CHANGED SINCE THE ISSUANCE OF THE OPERATING PERMIT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			

CERTIFICATION STATEMENT

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.*

SIGNATURE OF RESPONSIBLE OFFICIAL 	DATE SIGNED 7/16/10
PRINT NAME OF RESPONSIBLE OFFICIAL TIM TROST	

*This certification means that the signatory has verified compliance with all applicable regulations and operating permit conditions, and that the installation has complied with all monitoring, record keeping, reporting and testing conditions specified in the operating permit unless specified differently in a deviations report. For information concerning administrative and civil penalties, please consult Section 643.085 of the Revised Statutes of the State of Missouri (RSMo) and Section 643.151 RSMo, respectively.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 2

FIPS NO.

189

PLANT NO.

0312

INSTALLATION NAME

BRIDGETON LANDFILL, LLC

REPORTING PERIOD

1/1/10-6/30/10

1. PLANT-WIDE PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE PLANT-WIDE PERMIT CONDITIONS?

☒ YES ☐ NO

2. EMISSION UNIT PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE EMISSION UNIT PERMIT CONDITIONS?

☐ YES ☒ NO

3. CORE PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE CORE PERMIT REQUIREMENTS?

☐ YES ☒ NO

4. GENERAL PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE GENERAL PERMIT REQUIREMENTS?

☒ YES ☐ NO

NOTE: If you checked "Yes" in any of the four deviation questions above, and the installation has not previously reported the deviations, the installation must complete Part 3 of the Compliance Certification and Monitoring Report Form.

5. CURRENT COMPLIANCE STATUS

ARE YOU CURRENTLY IN COMPLIANCE WITH ALL AIR POLLUTION REQUIREMENTS?

☐ YES ☒ NO



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 3 - DEVIATIONS FROM REQUIRED MONITORING

FIPS NO. 189				PLANT NO. 0312	INSTALLATION NAME BRIDGETON LANDFILL, LLC				
REPORT PERIOD START DATE 1/1/10				REPORT PERIOD END DATE 6/30/10					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION	

SEE PREVIOUSLY SUBMITTED EXCEEDANCE REPORTS - LISTED IN PART 4.

Section VI General Permit Requirements 2)b)	N/A	N/A	Wellhead ST	Failed to report wellhead exceedances	4/1/2010	12 days	Exceedance not reported.	All wellhead monitoring exceedances reported w/in 10 days.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 4

FIPS NO.

189

PLANT NO.

0312

INSTALLATION NAME

BRIDGETON LANDFILL, LLC

REPORTING PERIOD

01/01/10 - 06/30/10

WERE THERE ANY OTHER MONITORING DEVIATION (EXCESS EMISSION) REPORTS SUBMITTED TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES- AIR POLLUTION CONTROL PROGRAM DURING THIS REPORTING PERIOD?

☒ YES ☐ NO (IF YES, SUBMIT A COPY OF THE REPORT OR COMPLETE THE DEVIATION REPORT SUMMARY BELOW)

PERMIT CONDITION	REPORTING REQUIREMENT	DATE REPORT SUBMITTED TO THE DEPARTMENT
SEE ATTACHED NSPS AND MACT REPORTS		
PW002 Reporting Condition 1 and 2	Submit NSPS semiannual report of records; report includes deviations from 10 CSR 10-5.490	7/30/10 (Reporting period 1/1/10 - 6/30/10)
	Submit SSM events in accordance with site's SSM Plan; report includes SSM events	7/30/10 (Reporting period 1/1/10 - 6/30/10)
General Permit Condition [10 CSR 10-6.065, (6)(C)1.C] 2)a) Reporting	Submit Title V Semi Annual Report	7/30/10 (Reporting period 1/1/10-6/30/10)
General Permit Condition [10 CSR 10-6.065, (6)(C)1.C] 2)b) Reporting	Submit supplemental reports as required or as needed.	Exceedance Reports for the following reporting periods: Reporting period 1/04/10 - 1/12/10; Reporting period 1/20/09 - 1/21/10; Reporting period 1/20/09 - 1/21/09; Reporting period 2/3/10 - 2/4/10; Reporting period 2/17/10 - 2/22/10; Reporting period 3/4/10 - 3/5/10; Reporting period 3/15/10 - 3/25/10 (CO); Reporting period 3/17/10 - 3/19/10; Reporting period 4/12/10 - 4/13/10; Reporting period 4/27/10 - 4/29/10; Reporting period 5/10/10 - 5/11/10; Reporting period 5/24/10 - 5/26/10; Reporting period 6/7/10 - 6/8/10; Reporting period 6/21/10 - 6/24/10